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May 13, 2025

**VIA ECF**

Hon Mark E. Hall  
U.S. Bankruptcy Court District of New Jersey  
402 East State Street  
Trenton, New Jersey 08608

RE: Rodriguez v PHH  
Adv. Pro No. 23-1212 (MEH)  
In re Linda Rodriguez  
Bankruptcy Case No. 19-19288 (MEH)  
United States Bankruptcy Court, District of New Jersey

Dear Judge Hall:

Please accept this additional communication to supplement this office's correspondence of April 14, 2025 in which the Plaintiff explained its ongoing efforts to have the Defendant produce "a complete, unfiltered, unedited DDCH screen."<sup>1</sup> While the Defendant has produced two portions of a DDCH screen, it remains unclear whether the Plaintiff has received a complete, unfiltered, and unedited version. The best that the Defendant's counsel has been able to offer is that it has "no knowledge" of any omissions.

Attached hereto as Exhibit A is the relevant portion of an email string between Mr. Reed Cohn, counsel to the Defendant, and me from the last few weeks. On May 2, 2025, after the Defendant produced a second portion of the DDCH screen, I inquired whether combining the two documents would "comprise a complete, unedited, and unfiltered DDCH report since roughly June 2019? Or has some of the information been altered, removed, or withheld in some way?" Four days later, on May 6, 2025, Mr. Cohn responded that the Defendant's counsel has "no knowledge that any information has been altered, removed, or withheld during this period." The following day, on May 7, 2025, I asked "Can someone at your client competent to do so certify that the two documents combined make up a complete, unedited, and unfiltered DDCH report since roughly June 2019?" To date, six days later, the Defendant's counsel has not responded to this question. I can only infer that the Defendant cannot make that certification. At this point, the Plaintiff requests that the Defendant produce a DDCH screen from June

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<sup>1</sup> All capitalized terms not otherwise defined herein have the same meaning as in the Plaintiff's Motion for Summary Judgment.

2019 to the present in the form of raw data so that there will be no question about its completeness or integrity.

At the last hearing, the Court was disinclined to address this issue in the form of a pretrial order. As such, the pretrial order submitted concurrently herewith addresses only the question of compensation for expert witnesses and does not resolve this issue. Please let me know if the Court has changed its views on the contents of the pretrial order so that it can be amended accordingly.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andy Winchell".

Andy Winchell

Encl.